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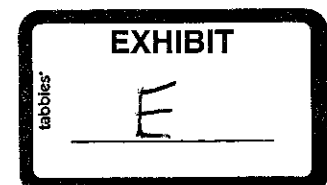
Transcript of the Testimony of Larry E. Gibbs

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Zeve Reporting & Videoconferencing
11032 Nicholas Lane
Suite A201
Berlin, Maryland 21811
Phone: (410)208-4566
Fax: (410)208-4767
Email: info@kathyzeve.com
Internet: www.zeverereporting.com



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1 Q Yes.

2 A Yes.

3 Q Okay. Who was your forklift operator after

4 Mr. Feddiman left the second time?

5 A Antonio Waters.

6 Q Antonio, what, please?

7 A Waters.

8 Q And after Mr. Waters?

9 A Mr. Feddiman came back.

10 Q Mr. Feddiman came back. And did he leave a second

11 time?

12 A No.

13 Q So you started out with him as your forklift

14 operator, then there came a time when he left and Mr. Betey

15 came in?

16 A Yes.

17 Q Then there came a time when Mr. Betey left and

18 Mr. Feddiman came back?

19 A Yes.

20 Q And then we have Mr. Waters and Mr. Feddiman, and

21 Mr. Feddiman is still your forklift operator today?

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1 A Yes.

2 Q When Mr. Betey became a forklift operator, had he

3 been on your crew before?

4 A No.

5 Q He hadn't been on your crew?

6 A No.

7 Q Had he been a catcher before, if you know?

8 A Not that I know, no.

9 Q Had he been employed with Mountaire, if you know?

10 A Yes.

11 Q He had been employed with Mountaire, but you don't

12 know in what job?

13 A Forklift operator.

14 Q He had been a forklift operator?

15 A Yes.

16 Q But for another crew?

17 A Yes.

18 Q How about Mr. Walters, when he became a forklift

19 operator, had he been on your crew?

20 A Yes.

21 Q Okay. And how did he come to be a forklift

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1 operator?

2 A He was one of my catchers, and he -- and learned

3 how to operate the forklift. He got an opportunity when

4 Mr. Feddiman left.

5 Q And did you recommend him for that job?

6 A I can't remember.

7 Q You say he got some training on the forklift. Who

8 provided the training?

9 A I guess Mountaire did, or while we were working,

10 he would train.

11 Q And who was responsible for watching all of his

12 training?

13 A I was.

14 Q Okay. So did you have any input into whether or

15 not he should get the job as a forklift operator?

16 A No.

17 Q You had none. If you thought he wasn't training

18 properly, wouldn't you say something to somebody?

19 A I'm sorry. When you said, did I have any input?

20 Q Yeah, into him becoming a forklift operator.

21 A I don't understand.

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1 Q All right. Did you have a say in it? Did you say

2 to anybody in the company, Waters is doing a good job. This

3 guy ought to be a forklift operator?

4 A No. I didn't say that.

5 Q What did you say to anybody?

6 A I was asked --

7 Q Okay.

8 A -- how was he doing.

9 Q By whom?

10 A I think Mr. Lynch asked me.

11 Q And what did you say?

12 A I said, he was doing well.

13 Q Okay. So you advised Mr. Lynch based on the fact

14 that you were observing Mr. Waters that he was doing well?

15 A Yes.

16 Q Okay. And he subsequently became, then, a

17 forklift operator?

18 A Yes.

19 Q And a forklift operator is a step above a catcher,

20 isn't he?

21 A His pay scale is, yes.

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<p style="text-align: right;">Page 78</p> <p>1 Q Directing -- okay. All right. From time to time, 2 new catchers have come on to your crew? 3 A Yes. 4 Q Okay. Have you ever suggested to anybody at 5 Mountaire that they hire a particular person as a catcher? 6 A Yes. 7 Q Okay. Who, if you can remember? 8 A The last one was Arthur, Arthur Belfield. 9 Q And was he hired? 10 A Yes. 11 Q Okay. And without -- and I don't mean to stretch 12 your memory, but have there been others like Mr. Belfield 13 that you recommended the company hire? 14 A That's it. I think I said maybe two or three. 15 Q Okay. And were they hired? 16 A I think all but one, I think. 17 Q Okay. 18 A I think two out of the three, yes, I think they 19 were hired. 20 Q Who was it -- do you remember the person who 21 wasn't?</p>	<p style="text-align: right;">Page 80</p> <p>1 A Nothing. 2 Q You would leave Mr. Garrison without a catcher? 3 A That's all I could do. 4 Q Okay. 5 A I tell him to contact Mr. Lynch or someone. 6 Q Have you ever asked any of the other crew leaders 7 to supply you with a catcher? 8 A Yes. 9 Q And have they done so? 10 A At times, yes. 11 Q Do some catchers work a double shift from time to 12 time? 13 A Yes. 14 Q And how does that occur? 15 A Like if -- if one of the catchers are working on 16 the first shift, and if I'm on, like, the third or fourth 17 shift, he would work with the first shift and then come work 18 on my shift also. 19 Q Okay. And, again, that's only if he wants to? 20 A That's correct. 21 Q Let me ask you this question. Do you know Donna</p>
<p style="text-align: right;">Page 79</p> <p>1 A No, I can't remember him. 2 Q Okay. There are other crew leaders employed at 3 Mountaire, we know, right? 4 A Yes. 5 Q Have other crew leaders asked you if you could 6 spare a member of your crew to come work on their crew 7 because they were short? 8 A Yes. 9 Q Okay. And when they've asked that, what have you 10 done? 11 A If I have a catcher available, I let him go catch 12 with that crew leader. 13 Q So you would tell someone from your crew to go 14 work for somebody's crew, for example, Mr. Garrison's crew, 15 if he needed it? 16 A It would be up to him. I would ask him, would he 17 want to go work with Mr. Garrison or whoever. Then that 18 would be up to him whether he would go catch with that crew 19 or not. 20 Q Okay. If you asked every one of the catchers and 21 they all said, no, what would you do?</p>	<p style="text-align: right;">Page 81</p> <p>1 Mumford? 2 A Donald Mumford? 3 Q Uh-huh. He works for Mountaire. 4 A You said Donald Mumford? 5 Q Donna. I'm sorry. 6 A Donna. Yes. I have met her before, yes. 7 Q Do you have occasion to talk to her at all? 8 A No, not anymore. 9 Q I'm sorry. Not anymore? 10 A Not anymore, no. 11 Q So there was a time when you did? 12 A (Witness nods.) 13 Q What would you talk to her about? 14 A Like, if one of my catchers had a problem with 15 the -- like say, a W-2 tax forms or something, then I would 16 ask Donna to help them out -- to help them. 17 Q All right. When you say W-2 form, you mean if the 18 catcher did not get a W-2 form, he would come to you and you 19 would talk to Donna about that? 20 A Yeah, something like that. 21 Q Any other occasion?</p>